

The proposed new restricted area would be a major block to aviation in a heavily traveled area. Comments by Lambert/Dwyer well illustrate why.

Certainly the FAA does not expect any pilot using the many local airports--including those in San Diego--will find climbing or descending over an 11,000 ft obstacle a viable alternative. This proposed restricted area would have to be in 5,000 ft MSL or lower range to offer any over-flight utility. As proposed, the new restricted area ceiling will, for practical reasons, be considered unlimited for all but transiting air carrier traffic.

Moving aircraft further off shore is not safe. This is especially true of fixed-gear aircraft which have a very low probability of successful ditching. Furthermore, VFR operations on top of the common low cloud layer pose near insurmountable obstacles to the safe conclusion of any mechanical difficulty. Often that cloud layer becomes solid a mile or two off-shore while the shore/inland area is clear.

The alternative of flying inland to the East of Camp Pendleton's other restricted area greatly increases the distance due to the Northwest/Southeast layout of southern California. Furthermore, the eastern boundry of Camp Pendleton is already heavily traveled with traffic from Camp Pendleton, Fallbrook Community Air Park, French Valley, Palomar and other airports. This area is also heavily traveled by transiting aircraft at lower altitudes; forcing coastal traffic inland (as the off shore route is sure to be rejected by most pilots)will only increase traffic and potential mid-air conflicts on the eastern edge of Camp Pendleton/Interstate 15 corridor.

Local pilots support the Marine Corps mission (many in our organization are retired Marines/military; others have close ties to the military). At Fallbrook we live under the Camp Pendleton traffic pattern and (mainly) happily co-exist with military air traffic. We respect the need of the Marines to train in a realistic environment. However, we find it arguable that the proposed restricted area enhances safety--it would seem a give/take proposition.

We do not see where general aviation wins anything with this proposal.

The military has been operating with the current restricted areas for decades, and we have not heard of problems with it.

We have not been informed about this wide-reaching proposal by the government, but were alerted strictly through voluntary membership in a major NGO. Such limited publicity of a major airspace change is disappointing. While hopefully not the case, the appearance is the government is not interested in public comment.

Due to limited information, we still have no idea of what "mitigations" the proposed rulemaking would deliver. Will the restricted area operate only during major military maneuvers?

Further disclosure of this proposed restricted area is sorely needed. Given the limited information now available, from this side of the restricted sky, this proposal should be denied--a shame if the military really does need more air space and a workable solution is at hand.